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Office of Information and Regulatory Affairs (OIRA)  
Office of Management and Budget (OMB)

**From:** Richard Gonzales, Federal Project Officer  
Office of Early Childhood Development (ECD)  
Administration for Children and Families (ACF)

**Date:** August 31, 2022

**Subject:** Change Request – Generic Information Collection under Generic Performance Progress Report (OMB #0970-0490): Preschool Development Grant Birth through Five (PDG B-5) Renewal Grant Performance Progress Report

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This memo requests approval of changes to the approved generic information collection (GenIC), Preschool Development Grant Birth through Five (PDG B-5) Renewal Grant Annual Performance Progress Report (APPR). This GenIC is approved under the Generic Performance Progress Report (OMB #0970-0490).

### ***Background***

In November 2019 OMB approved a generic information collection request for APPR Office of Child Care's (OCC) *Preschool Development Grant Birth through Five (PDG B-5) Renewal Grant* awardees. The initial approval was then updated in December 2021 to reflect grantee feedback. The tool approved through this change request included nine (9) comprehensive questions and was very well received by the PDG B-5 Renewal grantees. Upon reviewing this year's responses, however, it became clear that while we asked the grantees to provide data, where possible, to support their responses, we had not clarified what they needed to do in those situations where data is not available. Also, in many cases grantees addressed many, but not all, of their key activities, and so, we have added language to clarify that they should be reporting on all of the key activities in their approved scope of work.

Renewal Grantees will continue to report this data to ACF through their funding periods, which for some could extend through April 2025. In addition, prior to December 31, 2022, ACF will award as many as 25 additional 3-year Renewal Grants to states and territories presently without a PDG B-5 Renewal Grant.

### ***Overview of Requested Changes***

Overall, the purpose of this revised APPR remains consistent with the previously approved information collection: to help the Office of Early Childhood Development and OCC assess the progress of the PDG B-5 renewal grantees, as the states and territories work to improve coordination of their existing early childhood programs and services and funding streams in a mixed delivery model. This APPR remains tailored to the specific goals and objectives of the PDG B-5 Renewal Grants and will still allow ACF to collect useful data from grantees in a uniform and systematic manner. ACF intends to analyze gathered data to provide a descriptive snapshot of grantees and assess progress over time. This APPR will be collected annually and

supplement the information provided through the standard ACF PPR (OMB #0970-0406), which will be collected with more frequency (quarterly).

**This request includes two updates:** an increase in the number of respondents and revisions to the PDG B-5 Renewal Grant APPR.

#### Number of Respondents

We have updated the estimated number of respondents to 52 to reflect the maximum number of renewal grantees that will be required to complete the PDG B-5 Renewal Grant APPR in a year. This will cover current Renewal Grantees through the end of their awards (which will vary in timing) and those expected to be awarded by December 31, 2022.

#### Revisions to PDG B-5 Renewal Grant APPR

Proposed revisions to the PDG B-5 Renewal Grant APPR address shortcomings in the previously approved nine (9) comprehensive questions to be answered in a narrative format.

For each of the questions, states continue to be required to provide existing supporting data from their comprehensive, statewide, B-5 needs assessment, their related strategic plan, their program performance evaluation plan (PPEP), and/or, as applicable, their early childhood integrated data system (to the degree such a data system has been developed). The data can be submitted in any format that works for the state – embedded in the narrative document, or as appendices. Such an approach will allow the state to tell its story based on the unique and specific data collection, management, and use capabilities of each state.

To address the concerns identified with initial submissions, we have added clarifying language to 7 of the 9 core questions by asking each grantee to tell us why data is not available in those situations where the grantee does not provide data to support their response and to indicate whether it is anticipated that data will become available within the next year. We have tweaked the language related to COVID, changing reference to “the realities of COVID” to “the ongoing impact of COVID”. We have slightly increased the estimated time to complete the overall request based on these changes.

The updated PDG B-5 Renewal Grant APPR is included with the request, along with an updated submission form to update the number of respondents and the estimated time to complete.

#### **Time Sensitivities**

Because the PDG B-5 grantees are expected to complete their responses to these questions within the first 3 months of 2023, reflecting their progress in 2022, a quick approval would be most beneficial.

Note that an extension request for the umbrella generic (0970-0490) and all ongoing GenICs is currently underway with the 60-day comment period beginning July 6, 2022 (87 FR 40425).